

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

LULA WILLIAMS, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
v.	)	Civil Action No. 3:17-cv-461 (REP)
	)	
BIG PICTURE LOANS, LLC, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

**PLAINTIFFS' MOTION FOR CLASS CERTIFICATION OF  
CLAIMS AGAINST DEFENDANT MATT MARTORELLO**

Plaintiffs, on behalf of themselves and all other similarly situated individuals, pursuant to Rule 23 of the Federal Rules of Civil Procedure, respectfully move to certify their claims against Defendant Matt Martorello, for the reasons identified in the concurrently filed memorandum of law in support of this motion.

Respectfully submitted,  
**PLAINTIFFS**

By: /s/ Kristi C. Kelly  
Kristi C. Kelly, Esq., VSB #72791  
Andrew J. Guzzo, Esq., VSB #82170  
Casey Nash, Esq., VSB #84261  
KELLY & CRANDALL, PLC  
3925 Chain Bridge Road, Suite 202  
Fairfax, VA 22030  
(703) 424-7572  
(703) 591-0167 Facsimile  
Email: [kkelly@kellyandcrandall.com](mailto:kkelly@kellyandcrandall.com)  
Email: [aguzzo@kellyandcrandall.com](mailto:aguzzo@kellyandcrandall.com)  
Email: [casey@kellyandcrandall.com](mailto:casey@kellyandcrandall.com)  
*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th of September 2018, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/

Kristi Cahoon Kelly, Esq. (VSB #72791)

KELLY & CRANDALL, PLC

3925 Chain Bridge Road, Suite 202

Fairfax, VA 22030

Tel: 703-424-7572

Fax: 703-591-0167

Email: [kkelly@ kellyandcrandall.com](mailto:kkelly@kellyandcrandall.com)

*Counsel for the Plaintiffs*